



January 15, 2016

Pharmaceutical Working Group  
c/o Angelo J. Bellomo, REHS, QEP  
Deputy Director for Health Protection  
5050 Commerce Drive  
Baldwin Park, CA 91706

Sent via Email to: [EPR@lacounty.gov](mailto:EPR@lacounty.gov)

RE: Opposition to the Proposed Draft Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance

Dear Mr. Bellomo:

Biocom leads the advocacy efforts of the Southern California life science community with approximately 730 members including medical device, diagnostics, biotechnology and biofuels companies; universities; basic research institutions; and service support firms. As an advocacy organization we are actively engaged in ensuring that the life science industry remains a strong and growing part of the state's economy. Biocom is also committed to helping the Los Angeles life science cluster reach its full and very substantial potential. In this role, we would like to voice our concern and opposition to the draft ordinance cited above.

We write to express our agreement in opposition with much that has been said repeatedly by our fellow industry stakeholders such as BIO, PhRMA and AdvaMed. This proposal uses some of the flawed and as yet largely unproven assumptions adopted in other jurisdictions at great cost and limited to no perceptible benefit. The organizations listed above have throughout the stakeholder process listed in great detail the numerous issues this kind of ordinance would have in real life implementation. We will not belabor those points here, as they are already a significant part of the public record surrounding these issues.

It is indisputable that the key to effective environmental stewardship is equally shared responsibility at all points in the consumer chain, including everyone within that from manufacturer to consumer, and all points in between. These types of proposals also fail to recognize that, in light of HIPAA, manufacturers do not know exactly who the consumers are who are using many of their products and



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cannot contact them directly, making any program inherently imprecise. Furthermore, if followed, existing FDA-approved disposal methods remove unwanted drugs from the home in the quickest way possible, and are environmentally sound. As such, the appropriate role for the biopharmaceutical industry to play is public education that is widely available to the consumers of our products, and not a government-mandated collection program with little to no impact.

Thank you for your consideration of our concerns. If we may answer any questions, please contact me at [jjackson@biocom.org](mailto:jjackson@biocom.org) or 858-455-0300x102.

Sincerely,

A handwritten signature in black ink, appearing to read "Jimmy Jackson". The signature is stylized with a large, looped initial "J" and a cursive-style name.

Jimmy Jackson  
Senior Vice President of Public Policy  
Biocom